

C. Remarks

In response to the Office Action dated April 23, 2004, Applicants respectfully request favorable reconsideration of this application based on the foregoing claim amendments and the following remarks. Applicants respectfully submit that the claims as presented are in condition for allowance.

Rejections Under 35 U.S.C. § 112

At page 2, paragraph 3 of the Office Action claim 14 is rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. Applicants respectfully traverse the rejection based on the amendments above and the following remarks. Applicants have amended claim 1 to include “a first look-up-table,” thus claim 14 now properly recites the additional feature of “a second look-up-table.” Accordingly, Applicants respectfully request that the indefiniteness rejection with respect to claim 14 be withdrawn.

At page 2, paragraph 4 of the Office Action claim 6 is rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. Applicants respectfully traverse the rejection based on the amendments above and the following remarks. Applicants have amended claim 6 to recite “a CORBA server.” Accordingly, Applicants respectfully request that the indefiniteness rejection with respect to claim 6 be withdrawn.

Rejections Under 35 U.S.C. § 102(b)

At page 3, paragraph 6 of the Office Action claims 1, 11, 14, 15, 20, 21, and 23 are rejected under 35 U.S.C. § 102(b) as being anticipated by Alley, Jr. (U.S. Patent No. 5,687,224). Applicants respectfully traverse the rejection based on the foregoing amendments and the following remarks. Applicants submit that the Alley reference fails to disclose each and every element recited in claims 1, 11, 14, 15, 20, 21, and 23.

First, Applicants amended claim 1 to include all of the features of original claim 12, which was indicated as being allowable if rewritten in independent form including all of the

limitations of the base claim and any intervening claims (*see* Office Action at page 6, paragraph 26). Thus with respect to amended claim 1, Applicants submit that the Alley reference fails to disclose at least:

a database in communication with the first computer, the database having the attributes associated with the telecommunication network circuit stored therein . . .
wherein the database contains a first look-up-table for storing circuit type rules associated with telecommunication network circuits....,

Therefore, claim 1, as amended is neither anticipated nor rendered obvious in view of the Alley reference and the anticipation rejection with respect thereto should be withdrawn. Claims 11, 14, and 15 also are neither anticipated nor rendered obvious over the Alley references at least because they directly or indirectly depend from claim 1. Accordingly, the anticipation rejection also should be withdrawn with respect to these dependent claims.

Second, Applicants amended claim 20 to include essentially all of the features of original claim 12 (expressed in “means-plus-function” terms) which was indicated as being allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims (*see* Office Action at page 6, paragraph 26). Thus with respect to amended claim 20, Applicants submit that the Alley reference fails to disclose at least:

means for storing in communication with the first computer, the means for storing having the attributes associated with the telecommunication network circuit stored therein;
wherein the means for storing contains a first look-up-table for storing circuit type rules associated with telecommunication network circuits....,

Therefore, claim 20, as amended is neither anticipated nor rendered obvious in view of the Alley reference and the anticipation rejection with respect thereto should be withdrawn.

Third, Applicants amended claim 21 to include all of the features of original claim 25, which was indicated as being allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims (*see* Office Action at page 6, paragraph

26). Thus with respect to amended claim 21, Applicants submit that the Alley reference fails to disclose at least:

parsing a string in a look-up-table for determining a
telecommunication network circuit type in accordance with the
telecommunication network circuit ID number ...,

Therefore, claim 21, as amended is neither anticipated nor rendered obvious in view of the Alley reference and the anticipation rejection with respect thereto should be withdrawn. Claim 23 also is neither anticipated nor rendered obvious over the Alley references at least because they directly from claim 21. Accordingly, the anticipation rejection also should be withdrawn with respect to this dependent claim.

Rejections Under 35 U.S.C. § 103(a)

At page 4, paragraph 13 of the Office Action, claims 16 and 24 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Alley as applied to claims 1 and 21; at page 4, paragraph 16 of the Office Action claims 2-10, 22, 17-19, and 27-32 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Alley as applied to claims 1 and 21 and further in view of Imai et al. (CrispORB: High Performance CORBA for System Area Network); and at page 5, paragraph 22 claims 17 and 18 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Egawa et al. (U.S. Patent No. 5,745,694) in view of Imai et al. Applicants respectfully traverse each of these rejections based on the foregoing amendments and the following remarks.

Applicants respectfully submit that to establish a *prima facie* case of obviousness under 35 U.S.C. § 103(a) requires, among other things, that the cited references, whether taken alone or in combination, must at least teach or suggest each and every element of the claim. Applicants respectfully submit, however, that the cited references, whether taken alone or in combination, fail to teach or suggest each and every element recited in claims 2-10, 16-19, 22, 24, and 27-32, as amended, and therefore respectfully request that the obviousness rejections with respect to these claims be withdrawn.

First, with respect to claims 2-10, 16-19, Applicants submit that these claims are allowable at least because they depend from claim 1, which is amended to include all of the features of original claim 12. As stated previously, at page 6, paragraph 26 of the Office Action, claim 12 is indicated as being allowable if rewritten in independent form to include all of the limitations of the base claim and any intervening claims. Thus, Applicants submit that, as amended, claim 1 is non-obvious over the cited references, taken alone or in combination, and is in condition for allowance. Claims 2-10, 16-19 also are not obvious over the cited references, taken alone or in combination, at least because they depend from claim 1, either directly or indirectly. Accordingly, Applicants respectfully request withdrawal of the obviousness rejection with respect to these dependent claims. *See* MPEP §2143.03 (stating that if an independent claim is non-obvious under §103(a), then any claim depending therefrom is non-obvious).

Second, with respect to claims 22 and 24, Applicants submit that these claims are allowable at least because they depend from claim 21, which is amended to include all of the features of original claim 25. As stated previously, at page 6, paragraph 26 of the Office Action, claim 25 is indicated as being allowable if rewritten in independent form to include all of the limitations of the base claim and any intervening claims. Thus, Applicants submit that, as amended, claim 21 is non-obvious over the cited references, taken alone or in combination, and is in condition for allowance. Claims 22 and 24 also are not obvious over the cited references, taken alone or in combination, at least because they depend from claim 21, either directly or indirectly. Accordingly, Applicants respectfully request withdrawal of the obviousness rejection with respect to these dependent claims. *See* MPEP §2143.03.

Third, with respect to claims 27-32, Applicants submit that these claims are allowable at least because they depend from claim 27, which is amended to include all of the features of original claim 25. As stated previously, at page 6, paragraph 26 of the Office Action, claim 25 is indicated as being allowable if rewritten in independent form to include all of the limitations of the base claim and any intervening claims. Thus, Applicants submit that, as amended, claim 27 is non-obvious over the cited references, taken alone or in combination, and is in condition for

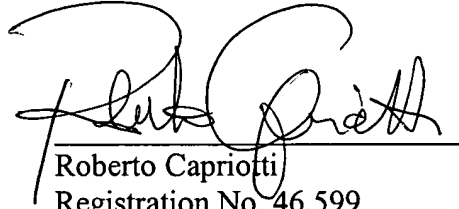
allowance. Claims 29-32 also are not obvious over the cited references, taken alone or in combination, at least because they depend from claim 27 directly. Accordingly, Applicants respectfully request withdrawal of the obviousness rejection with respect to these dependent claims. *See* MPEP §2143.03.

Applicants do not otherwise concede, however, the correctness of the Office's rejection with respect to any of the dependent claims discussed above and hereby reserves the right to make additional arguments as may be necessary because the dependent claims contain additional features that further distinguish them from the cited references, taken alone or in combination. A detailed discussion of these differences is believed to be unnecessary at this time in view of the basic differences in the independent claims pointed out above.

D. Conclusion

As all of the issues raised in the Office Action have been addressed, the Applicants respectfully request favorable reconsideration of this application and the issuance of a notice of allowance with respect to the pending claims. If the Examiner believes that the present application is in condition for disposition other than allowance, Applicants respectfully request that the Examiner contact the undersigned at the telephone number listed below so that the Examiner's concerns may be expeditiously addressed.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Roberto Capriotti', is written over a horizontal line.

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